

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In re

SONIA M. ACEVEDO MARRERO
Debtor

MARGARITA ROSADO MUÑOZ,
GABRIEL ROSADO MUÑOZ and DAVID
ROSADO NUÑEZ
Movants

vs

SONIA M. ACEVEDO MARRERO
Respondent

CASE NO. 10-11522 BKT

Chapter 11

INDEX

**MOTION SUBMITTING EXHIBITS
AND REQUEST FOR TIME TO TRANSLATE**

TO THE HONORABLE COURT:

COME NOW parties-in-interest MARGARITA ROSADO MUÑOZ, GABRIEL ROSADO MUÑOZ and DAVID ROSADO NUÑEZ through the undersigned attorneys and very respectfully STATE and PRAY:

1. On December 15, 2020 the appearing parties filed a motion to dismiss the bankruptcy petition for lack of good faith (Docket No. 8) and a motion for relief from stay (Docket No. 9). Both motions have been scheduled for a hearing to be held on January 11, 2011 at 9:00 am.

2. In addition to the documents submitted with said motions, the appearing parties hereby submit the following Exhibits, further showing debtor's brazen and obstinate conduct in the state court action which she tried to derail with the filing of this bankruptcy petition. The appearing parties also submit herewith a negative affidavit showing that debtor is not in active military duty or service covered by the Service Member Relief Act of 2003.

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3. The additional Exhibits attached to this motion are:

| Exhibit No. | Pages | Date & Description |
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| Composite Exhibit 1 -2009 Proceedings- | | |
| | 1 - 4 | 5/20/2009 Very Urgent Re-filing of Urgent Request for Provisional Remedies |
| | 5-7 | 7/16/09 Motion Informing Defendant's Failure to Disclose, Failure to Comply with Discovery, and Requesting Subpoenas for Additional Depositions. |
| | 8-10 | 8/10/09 Urgent motion directing compliance with deposition subpoena. |
| | 11-17 | 8/18/09 Urgent Motion under Rule 34 Requesting Order Directing Defendant to Disclose Information Requested through Discovery Procedures. |
| | 18-23 | 8/29/09 Urgent Motion Regarding Valuation made by defendant, describing same as defective, arbitrary, ridiculously low and full of bad faith. |
| | 24-29 | 11/13/09 Urgent Request for Order directing defendant Acevedo to appear for the conclusion of her deposition, that said appearance be under penalty of perjury, that the deposition be held in the courthouse and requesting sanctions. |
| | 25-32 | 12/3/09 Motion requesting THIRD ORDER directing defendant Acevedo to appear at deposition and for production of documents. |
| | 33-34 | 12/15/09 Order directing valuation of art |
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| Composite Exhibit 2 -2010 Proceedings- | | | |
| | 1-3 | 2/7/10 | Motion requesting FOURTH ORDER directing defendant Acevedo to appear at her deposition. |
| | 4-6 | 3/24/10 | Motion requesting SECOND ORDER for production of documents and objects and requesting imposition of sanctions. |
| | 7-10 | 5/3/10 | Motion requesting that defendant Sonia Acevedo Marrero be held in CONTEMPT. |
| | 11-14 | 6/4/10 | Motion requesting FIFTH ORDER directing defendant Acevedo to appear at her deposition. |
| | 15-17 | 6/24/10 | Motion requesting SEVERE SANCTIONS for failure to comply with FIFTH ORDER directing appearance at deposition. |
| | 18-25 | 8/30/10 | OPINION AND ORDER by Court of Appeals denying Certiorari and vacating stay of proceedings. |
| | 26-27 | 11/22/10 | Motion requesting Order providing for procedures for the surrender of the works of art. |
| | | | |
| EXHIBIT 3 | | 12/21/2010 | Declaration regarding Service Members Civil Relief Act. |

4. Leave is hereby requested to file the Exhibits to both motions mentioned in paragraph 1 in the Spanish language, and that the appearing parties be allowed to submit English translations until the latter of 45 days from this motion or 10 days from the filing of any appeal regarding the remedies

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requested by the appearing parties.

WHEREFORE, it is respectfully requested that the Honorable Court take notice of the attached Exhibits, that the same be deemed part of the motions filed under Dockets No. 8 and 9, and that the appearing parties be allowed to submit English translations as prayed for above.

In San Juan, Puerto Rico, this 21ST day of December, 2010.

EDGARDO MUÑOZ, PSC

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